

UNITED STATES DISTRICT COURT

for the
Western District of WashingtonIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
SUBJECT ACCOUNTS

Case No. MJ22-574

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

SUBJECT ACCOUNTS as further described in Attachment A, which is attached hereto and incorporated herein by this reference.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, which is attached hereto and incorporated herein by this reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
Title 18, U.S.C. § 2251	Production of Child Pornography
Title 18, U.S.C. § 2252(a)	Possession of Child Pornography

The application is based on these facts:

- ☒ See Affidavit of Special Agent Garon, continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.


Applicant's signature

Amy Garon, Special Agent
Printed name and title

- ☒ The foregoing affidavit was sworn to before me and signed in my presence, or
☐ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 11/30/2022


Judge's signature

City and state: Seattle, Washington

S. Kate Vaughan, United States Magistrate Judge
Printed name and title

STATE OF WASHINGTON)
) SS
COUNTY OF KING)

INTRODUCTION AND AGENT BACKGROUND

Affidavit of SA Garon – 1
USAO# 2022R01296

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5200
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 (ICAC) Task Force, and work with other federal, state, and local law enforcement personnel in the
2 investigation and prosecution of crimes involving the sexual exploitation of children.

3 2. I make this affidavit in support of an application for a search warrant for information
4 associated with certain Skype accounts (Skype is operated by Skype Technologies, a Division of the
5 Microsoft Corporation), stored at premises controlled by Microsoft Corporation, a message provider
6 headquartered at 1 Microsoft Way, Redmond, Washington 98052. The information to be searched is
7 described in the following paragraphs and in Attachment A. This affidavit is made in support of an
8 application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to
9 require Skype to disclose to the government copies of the information (including the content of
10 communications) further described in Section I of Attachment B. Upon receipt of the information
11 described in Section I of Attachment B, government-authorized persons will review that information
12 to locate the items described in Section II of Attachment B.

13 3. The facts set forth in this Affidavit are based on my own personal knowledge;
14 knowledge obtained from other individuals during my participation in this investigation, including
15 other law enforcement officers; review of documents and records related to this investigation;
16 communications with others who have personal knowledge of the events and circumstances
17 described herein; and information gained through my training and experience. Because this
18 Affidavit is submitted for the limited purpose of establishing probable cause in support of the
19 application for a search warrant, it does not set forth each and every fact that I or others have learned
20 during the course of this investigation.

21 4. As is detailed below, CHRISTOPHER OLSTEN passed away and this search warrant
22 is being submitted to attempt to identify or locate unknown co-conspirators of CHRISTOPHER
23 OLSTEN. Based on my training and experience and the facts as set forth in this affidavit, there is
24 probable cause to believe that violations of 18 U.S.C. §§ 2251(c) (sexual exploitation of a child
25 outside the United States); 2251(e) (attempt and conspiracy to violate § 2251(c)); 2252A(a)(3)(B)
26 (promotion of child pornography); 2252A(b)(1) (conspiracy to promote child pornography); 2260(a)
27 (production of sexually explicit depictions of a minor for importation into the United States); and
28 2260(c)(1) (attempt and conspiracy to violate § 2260(a)) , (hereinafter the "TARGET OFFENSES")
have been committed by unknown co-conspirators of CHRISTOPHER OLSTEN. There is also

1 probable cause to search the information described in Attachment A for evidence, instrumentalities,
2 contraband or fruits of these crimes further described in Attachment B.

3 4 **BACKGROUND**

5 5. Since 2012, a HSI undercover agent (UCA) has been investigating individuals in the
6 Philippines who sell live streaming webcam shows involving the sexual abuse and exploitation of
7 children to paying customers worldwide. These investigations are conducted mainly through
8 undercover communications used to infiltrate closed communities of offenders. This growing child
9 abuse industry involves child traffickers in the Philippines who collect viewership fees from vetted
10 customers worldwide. Paying customers are allowed to direct the abuser/child trafficker to perform
11 acts of sexual abuse on minor children in real time during a private webcam interaction. Undercover
12 operations associated with this case originated in Portland, Maine and included the collaboration of
13 HSI Attaché Manila and law enforcement entities in the Philippines.

14 **THE INVESTIGATION**

15 6. On April 22, 2020, the UCA's Facebook (FB) profile received a friend request from
16 profile "Nnasirhc ESPIRITU" ("ESPIRITU"). ESPIRITU's FB profile indicated the individual
17 resided in the Philippines.

18 7. On April 23, 2020, during a private FB conversation with ESPIRITU, the UCA
19 received historical images of two female children. The first image depicted a young girl (hereinafter
20 V1) in a nightie. Two subsequent images depicted V1 standing naked. A fourth image depicted a
21 clothed and slightly older female child (V2). According to ESPIRITU, V1 was her 5-year-old
22 daughter and V2 was her 7-year-old niece. ESPIRITU solicited the UCA to wire funds to her in
23 exchange for sexually explicit live-streaming shows of V1 and V2. The UCA agreed to send one
24 initial payment for \$50.00 to establish credibility. The second payment would be forwarded on a
25 later date when V1 and V2 were both present.¹

26
27 ¹ The technique of sending child traffickers a partial or advance payment has been used several times with success in this
28 investigation. When used in this specific and controlled capacity, the Purchase of Evidence (POE) establishes credibility
and allows investigators to identify offending parties, trafficked victim(s), payment pickup locations and associated
financial funnel accounts without putting victims in an exploitive scenario. At no time is it requested for the children to
be put in a harmful situation.

1 8. ESPIRITU asked the UCA to send the payment to her aunt Lucille R. BAYANI
 2 (“BAYANI”) who would collect the payment on ESPIRITU’s behalf. The UCA subsequently used
 3 the online Money Service Business (MSB) Xoom to send the funds to BAYANI in the Philippines.

4 9. A portion of this FB private conversation is transcribed below:²

5 ESPIRITU: Hi

6 ESPIRITU: Dina.cruz88

7 HSI UCA: Hi bb

8 HSI UCA: This is private here and safe

9 HSI UCA: Here bb

10 ESPIRITU: Hello

11 ESPIRITU: U there hon

12 ESPIRITU: U there honey

13 HSI UCA: I’m here bb

14 ESPIRITU: Hello

15 ESPIRITU: Hru now

16 ESPIRITU: Can u help me

17 HSI UCA: Good bb

18 HSI UCA: What I get

19 HSI UCA: What ages u have

20 ESPIRITU: Im show to u

21 HSI UCA: U have young

22 ESPIRITU: Yes but so young 5

23 ESPIRITU: Hon

24 HSI UCA: She do show before?

25 HSI UCA: If not is ok

26 ESPIRITU: Nope

27 HSI UCA: Ok then I don’t want

28 ² All grammatical errors in this chat and all others I reference in this affidavit were in the original chats. Emoticons, symbols often used in instant messaging to convey emotion, have been removed. The HSI undercover Facebook username has been replaced with “HSI UCA.”

1 ESPIRITU: But me im show to u
2 ESPIRITU: U not help
3 HSI UCA: U have other young that do?
4 ESPIRITU: Yes
5 HSI UCA: Mmm
6 ESPIRITU: But how much u pay
7 HSI UCA: 50 each
8 HSI UCA: What ages they?
9 ESPIRITU: *Image of V1 in a nightie was sent*
10 ESPIRITU: Look
11 ESPIRITU: Do you like
12 HSI UCA: Yes
13 ESPIRITU: But wht deal sent 1st before show
14 HSI UCA: I don't understand
15 ESPIRITU: U sent ist before show
16 ESPIRITU: Need food young and me
17 ESPIRITU: Do you know marry
18 ESPIRITU: Hello
19 HSI UCA: I send befire show yes
20 HSI UCA: So u trust me
21 ESPIRITU: U sent then show

22 10. On April 27, 2020, the UCA communicated with ESPIRITU via Skype typed chat
23 and live streaming video. ESPIRITU used the following Skype account to communicate with the
24 UCA from a mobile phone:

25 Skype ID: **dina.cruz88**

26 Skype Display Name: Dina Cruz

27 11. During the conversation, ESPIRITU turned on her webcam so the UCA could see the
28 children being offered for a sexually explicit show. The UCA observed ESPIRITU, V1 and a young
male child (V3). ESPIRITU stated V3 was her 5-year-old son. V1 and V3 were fully clothed as
requested by the UCA prior to the video call. Specifically, the UCA requested to see the child wave

1 to the camera.³ ESPIRITU said V2 was not present due to sickness but available for a show upon
 2 recovery.

3 12. A portion of this Skype chat is transcribed below.

4 Dina Cruz: Sorry coz i have sore eyes

5 Dina Cruz: Delaye show

6 HSI UCA: its ok

7 HSI UCA: i just want to see wave tonight

8 HSI UCA: but what they do in show for me when i get it

9 Dina Cruz: Ok

10 HSI UCA: how old is she bb

11 Dina Cruz: 5 yrs

12 HSI UCA: mmm

13 HSI UCA: how old the other girl u have

14 Dina Cruz: She still milk need milk hehehe

15 Dina Cruz: 7

16 HSI UCA: nice

17 HSI UCA: when we do show what i get?

18 HSI UCA: what they do in show mmm

19 HSI UCA: for my money

20 Dina Cruz: How much

21 Dina Cruz: U like show here

22 HSI UCA: not now

23 HSI UCA: later

24 HSI UCA: when they both there

25 HSI UCA: does the boy do show too with them??

26 Dina Cruz: Ok but u help noe

27 Dina Cruz: Say young give mild

28 HSI UCA: how old is he>

³ This is an investigative technique used to provide Philippine investigators the visual evidence necessary to meet the probable cause standard under Philippine law.

1 Dina Cruz: Who
2 Dina Cruz: Boy
3 HSI UCA: yes
4 Dina Cruz: Same
5 HSI UCA: both 5 wow
6 HSI UCA: bb i send u nw
7 Dina Cruz: Yes
8 Dina Cruz: Only 50
9 HSI UCA: but tell me what they do in the show for me
10 Dina Cruz: See pussy and doggystyed
11 HSI UCA: mmm nice
12 HSI UCA: the five and ???
13 Dina Cruz: Can u sent 75 for buy milk
14 Dina Cruz: Yes
15 Dina Cruz: If ok to u
16 HSI UCA: ill try
17 Dina Cruz: Ok tn timer
18 HSI UCA: do u still have the pic u sent last week?
19 HSI UCA: I don't want u to take another one
20 HSI UCA: but if u still have u can send it
21 Dina Cruz: 7
22 HSI UCA: but don't take a new one for me. ill just wait for the live show
23 if dont have

24 13. The UCA subsequently used Xoom, an online Money Service Business, to send funds
25 to BAYANI in the Philippines. BAYANI was accepting payments on ESPIRITU's behalf.

26 14. On May 6, 2020, a preservation letter was submitted to Microsoft, Inc. under 18
27 U.S.C. § 2703(f), requesting that Microsoft preserve all stored communications, records and other
28 evidence relating to the Skype IDs: **dina.cruz88** (display name: Dina Cruz). On August 3, 2020, a
request for a 90-day extension of the preservation period was sent to Microsoft. On November 9,

2020, the UCA confirmed that the Skype account associated with Skype ID **dina.cruz88** was still an active account.

15. On November 12, 2020, HSI Portland, Maine obtained a federal search warrant for the Skype account associated with Skype ID **dina.cruz88** under Case number 2:20-MJ-314-JHR.

16. A review of the Skype account associated with Skype ID **dina.cruz88** located communication between it and another Skype account with Skype ID **chrisolsten** that was indicative of child sex trafficking via live streaming. This chat spanned May 4, 2017 to April 2, 2020.

17. Details from photos shared within the Skype chat of money remittances identified the user of Skype ID **chrisolsten** as:

a. Xoom transaction XTKMYV6P on 3/5/2020 to Anna Espiritu

Name: Christopher Olsten

Billing Address: 234 Waipahe Street, Kihei, Hawaii 96753

b. Western Union transfer number 632-738-5025 on 3/6/2020

Sender: Chris OLTEN

Address: 234 Waipahe Pl, Kihei, Hawaii 96753

Phone: 808-8663876

18. A query of the State of Hawaii Driver's Licensing database located a driver's license for the name Christopher OLTEN:

Number: H00327327

Name: Christopher David OLTEN

Date of Birth: February 18, 1977

Address: 234 Waipahe Pl, Kihei, HI 96753

19. Subpoenaed registration information from Skype provided the following information for Skype ID **chrisolsten**:

Creation IP: 193.120.212.0 (IEUNET, Cork, Ireland)

Creation Date: 06/05/2010

Email address: chrisgsxr750@yahoo.com

20. On August 24, 2022, HSI Honolulu, Hawaii, received an investigative referral from HSI Portland, Maine for OLTEN and was provided with a copy of the Skype chat and 109 image

1 files that had been shared in the chat and obtained via the search warrant of Skype ID **dina.cruz88**'s
2 account.

3 21. On August 24, 2022, a preservation letter was submitted to Microsoft, Inc. under 18
4 U.S.C. § 2703(f), requesting that Microsoft preserve all stored communications, records and other
5 evidence relating to the Skype ID: **chrisolsten**

6 22. Subpoenaed subscriber information from Yahoo provided the following information
7 for email **chrisgsxr750@yahoo.com**:

8 Registration IP Address: 66.8.169.144 (Spectrum ISP in Makawao, Maui, HI)

9 Registration Date: 2001-11-24T08:56:18.000Z

10 Full Name: Chris OLSHEN

11 City, State: Wailuku, HI 96793

12 Recovery email: **chrisolsten@gmail.com**

13 Recovery Phones: +18088668644 Verified, +18088663876 Verified

14 23. Subpoenaed subscriber information from Verizon provided the following information
15 for phone number +18088663876:

16 Account Number: 973184199-1

17 Name: Christopher OLSHEN

18 Address: 234 Waipahe Pl, Kihei, HI 96753

19 Dates of service: 03/29/2016 – 10/28/2017

20 24. Subpoenaed subscriber information from Verizon provided the following information
21 for phone number +18088668644:

22 Account Number: 442122474-1

23 Name: Brandon Matich, Hula Adventures

24 Contact Name: Chris OLSHEN

25 Address: 2670 Wai Wai Pl, Kihei, HI 96753

26 Dates of service: 08/01/2017 – 02/27/2022
27
28

25. A review of the Skype chat between **dina.cruz88** and **chrisolsten** located instances when live streaming webcam sex shows were conducted with persons believed to be under the age of 18 years old and the distribution of child sexual abuse material (CSAM) images.⁴

26. On June 4, 2019, **dina.cruz88** asked **chrisolsten** to send her pictures of V4 (HSI Honolulu does not know if this was one of the young girls previously offered to the HSI UCA by **dina.cruz88**). In return, **chrisolsten** sent **dina.cruz88** approximately 50 images of a near pubescent Filipino girl in various stages of undress as well as completely naked in which her breasts, vagina, and bottom areas are shown. This batch of images also included images of vaginal digital penetration and close-up images of breasts and vaginas. Based on previous and subsequent Skype conversations not included herein, but that I have reviewed, and my training and experience, I believe that **dina.cruz88** asked **chrisolsten** to send her back pictures of V4 that **dina.cruz88** had previously sent to **chrisolsten**.

27. On July 3, 2019, it appeared **dina.cruz88** hosted a Skype live streaming webcam show for **chrisolsten** between her and V4. A portion of the typed Skype chat is transcribed below.

dina.cruz88: Ready now babe

chrisolsten: ok

dina.cruz88: For watch show

chrisolsten: i hope you try lick [V4]

dina.cruz88: Call started⁵

Based on the context of the surrounding typed chat conversation, this indicates the beginning of the live webcam call.

chrisolsten: cam is good today

... connection issues ...

dina.cruz88: U see naked me and [V4]

⁴ HSI did not have access to the live webcam feeds, but this conclusion was made based on the investigation, including a review of the content of the typed chats aligned with the webcam feeds and other information, all of which strongly suggested that a minor was involved.

⁵ The term "Call" is the terminology used by Skype to indicate that a Skype call was initiated during the chat.

1 **chrisolsten:** yes why you always stop cam?

2 ... connection issues ...

3 **chrisolsten:** don't fake touch

4 **dina.cruz88:** OK

5 **chrisolsten:** I want touch

6 **chrisolsten:** [V4] have little hair now right?

7 ...

8 **chrisolsten:** can you lick pussy?

9 **dina.cruz88:** She shy she dont like

10 **dina.cruz88:** She show

11 **chrisolsten:** ok

12 **chrisolsten:** its ok finger inside?

13 **chrisolsten:** hmmmmm

14 **dina.cruz88:** Babe im continued show later my load lost

15 [**dina.cruz88** is referring to her phone service credits.]

16 **chrisolsten:** cam keep cut

17 **dina.cruz88:** I'm sad my load only 1

18 **chrisolsten:** I cant cum

19 **dina.cruz88:** Im buy if u help and continued show

20 **dina.cruz88:** Mmmmm

21 **chrisolsten:** what show?

22 **dina.cruz88:** U not cum

23 **chrisolsten:** no

24 28. On July 3, 2019, **chrisolsten** sent information to **dina.cruz88** regarding a transaction
25 of 1,700 Philippines Pesos (PHP) sent to Marvin ESPIRITU in Taguig City, Philippines via World
26
27
28

1 Remit Corp. Subpoenaed World Remit Corp transactional data provided the following additional
2 information for this transaction:

3 Sender Name: Chris OLSTEN

4 Sender Birthdate: 02/18/1977

5 Sender Mobile Number: 808-866-8645

6 Sender Email: chrisolsten@gmail.com

7 Sender Address: 234 Waipahe Pl 234 Kihei HI 96753

8 29. On August 6, 2019, it appeared **dina.cruz88** hosted another Skype live streaming
9 webcam show for **chrisolsten** between her and V4. A portion of the typed Skype chat is transcribed
10 below.

11 **chrisolsten:** What you give me for 2500?

12 **dina.cruz88:** Show V4 me too I'm not show with guy coz coming midnight

13 [... several calls were started with **chrisolsten** complaining about the lighting...]

14 **chrisolsten:** dark cam again

15 **chrisolsten:** put finger inside

16 **chrisolsten:** not good show today

17 **chrisolsten:** camera not good and show not sexy

18 ...

19 **chrisolsten:** no you put cam in bad spot

20 ...

21 **chrisolsten:** and [V4] not do anything

22 ...

23 **chrisolsten:** deal was you and [V4]

24 30. On August 6, 2019, **chrisolsten** sent information to **dina.cruz88** regarding a
25 transaction of 2,500 PHP sent to Marvin ESPIRITU in Taguig City, Philippines via World Remit
26 Corp. Subpoenaed World Remit Corp transactional data duplicated the sender information from the
27 July 3, 2019, transaction.

28 31. On October 22, 2019, it appeared **dina.cruz88** hosted another Skype live streaming
webcam show for **chrisolsten** between her and V4. At the end of the show, **chrisolsten** asked for

1 some pictures. In response **dina.cruz88** sent four photos of a possibly pubescent female's naked
2 body with the focus on her vaginal area (the female's face was not visible).

3 32. On October 22, 2019, **chrisolsten** sent information to **dina.cruz88** regarding a
4 transaction of 2,500 PHP sent to Marvin ESPIRITU in Taguig City, Philippines via World Remit
5 Corp. Subpoenaed World Remit Corp transactional data duplicated the sender information from the
6 previous transactions.

7 33. On December 17, 2019, **dina.cruz88** asked **chrisolsten** to send her pictures of V4 to
8 send to a foreigner who will pay for them. **chrisolsten** did not send any pictures. **dina.cruz88** sent
9 **chrisolsten** three photos of a naked prepubescent female's body including one where the female is
10 spreading apart her labia with her hands to expose her vagina. **dina.cruz88** identified the female as
her 11-year-old cousin.

11 34. In January 2020, **dina.cruz88** began using BAYANI as the recipient of payments
12 from **chrisolsten**.

13 35. Further review of the communication between **dina.cruz88** and **chrisolsten** revealed
14 additional live streaming webcam sex shows believed to contain adult performers or unfulfilled
15 promises of live streaming webcam sex shows with V4 and others for which **chrisolsten** sent funds
16 or purchased phone service for **dina.cruz88**.

17 36. A review of subpoenaed money remittance information, found that in addition to a
18 total of \$3,030.30 sent to ESPIRITU aka **dina.cruz88**, Marvin ESPIRITU and BAYANI, OLSTEN
19 sent remittances to an additional 52 recipients in the Philippines and one in Madagascar, totaling
\$39,776.53 between January 3, 2017, and December 23, 2020.

20 37. Maui Police Department reporting indicated that OLSTEN died on December 27,
21 2021, and his death was ruled a suicide.

22 38. Despite OLSTEN's death in December 2021, I am seeking this warrant to identify
23 other vendors that OLSTEN sent money to, possibly through co-conspirators who collected
24 payments on the vendor's behalf, who may offer live streaming webcam shows involving the sexual
25 abuse and exploitation of children. The requested information is sought in order to identify and
26 locate victims of child sexual abuse in the Philippines as well as identify and locate unknown co-
27 conspirators of OLSTEN.
28

BACKGROUND CONCERNING SKYPE

39. In my training and experience, as well as from my review of publicly available information, I know that Skype is a software product that allows users to conduct video chats and voice calls over the Internet. Skype users can also send instant messages, exchange files and images, send video messages, and create conference calls. Skype software is available for use on personal computers as well as smartphones and tablets. Skype was first released in 2003. It was acquired by Microsoft in 2011 and is now a division of Microsoft Corporation.

40. Microsoft's privacy statement, which was last updated in September 2022 and is available at <https://privacy.microsoft.com/en-us/privacystatement>, states that Microsoft "collects data from you, through our interactions with you and through our products. You provide some of this data directly, and we get some of it by collecting data about your interactions, use, and experiences with our products. The data we collect depends on the context of your interactions with Microsoft and the choices you make, including your privacy settings and the products and features you use. We also obtain data about you from third parties."

41. According to support information provided by Microsoft and available at <https://support.skype.com/en/faq/FA34893/how-long-are-files-and-data-available-in-skype>, "Skype stores files and photos you've shared, calls you've recorded, and other items for easy access across all your devices." Messages, videos and pictures are available until they are deleted or dated back to April 2017⁶, and chat titles are available until deleted or users leave conversations. Thus, depending on when a chat occurred and whether a user elected to delete it, it is possible that the content of chats will be found on servers controlled by Microsoft.

42. Skype allows subscribers to create user accounts and create a unique member name. The user can change this user name at any time. The Skype ID associated with the Skype account, by contrast, cannot be changed by the user. For example, Skype Name "Mr. Chico" could change the

⁶ From other open-source internet research, it appears that the reference to April 2017 was because the Skype support information was posted to Microsoft's web site in April 2019. It appears Skype will save chat history for a period of two years.

1 name to another series of letters, numbers or symbols, but the Skype ID live:.cid.9b91b44105c2fb17
2 would remain the same.

3 43. A Skype subscriber can also store contact lists on servers maintained and/or owned
4 by Microsoft. In my training and experience, evidence of who was using an online account, such as
5 Skype, may be found in address books or contact lists.

6 44. Based on information provided by Skype to law enforcement, the following types of
7 information will be provided upon receipt of appropriate legal process:

8 Registration Details: information captured at time of account registration;

9 Billing Address: User-provided billing addresses; Payment Method/Instrument Data;

10 Purchase History: transactional records;

11 IP Logs: IP addresses captured at the time of the user login to the Skype service;

12 Skype Number Service History: list of Skype Number(s) subscribed to by a user;

13 Skype Out Records: Historical call detail records for calls placed to the public
14 switched telephone network (PSTN);

15 Skype Number Records: Historical call detail records for calls received from the
16 public switched telephone network (PSTN);

17 SMS Records: SMS historical detail records;

18 E-mail records: historical record of e-mail change activity;

19 Skype username's Contact/Buddy List; and

20 Skype username's Chat/Media content.

21 45. Chat content on Skype's servers and the contact list will enable investigators to
22 identify other vendors or co-conspirators (who, as noted above, directly participate in the abuse of
23 children by proffering the activity).

24 **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

25 46. Pursuant to Title 18, United States Code, Section 2703(g), this application and
26 affidavit for a search warrant seeks authorization to permit Microsoft, and its agents and
27 employees, to assist agents in the execution of this warrant. Once issued, the search warrant
28 will be presented to Microsoft with direction that it identifies the Skype account(s) described
in Attachment A to this affidavit, as well as other associated subscriber and log records as set
forth in Section I of Attachment B to this affidavit.

1 47. The search warrant will direct Microsoft to create an exact copy of the
2 specified account and records.


3 48. I, and/or other law enforcement personnel will thereafter review the copy of
4 the electronically stored data, and identify from among that content those items that come
5 within the items identified in Section II to Attachment B, for seizure.

6 49. Analyzing the data contained in the forensic image may require special
7 technical skills, equipment, and software. It could also be very time-consuming. Searching
8 by keywords, for example, can yield thousands of “hits,” each of which must then be
9 reviewed in context by the examiner to determine whether the data is within the scope of the
10 warrant. Merely finding a relevant “hit” does not end the review process. Keywords used
11 originally need to be modified continuously, based on interim results. Certain file formats,
12 moreover, do not lend themselves to keyword searches, as keywords, search text, and many
13 common e-mail, database and spreadsheet applications do not store data as searchable text.
14 The data may be saved, instead, in proprietary non-text format. And, as the volume of
15 storage allotted by service providers increases, the time it takes to properly analyze
16 recovered data increases, as well. Consistent with the foregoing, searching the recovered
17 data for the information subject to seizure pursuant to this warrant may require a range of
18 data analysis techniques and may take weeks or even months. All forensic analysis of the
19 data will employ only those search protocols and methodologies reasonably designed to
20 identify and seize the items identified in Section II of Attachment B to the warrant.

21 50. Based on my experience and training, and the experience and training of other
22 agents with whom I have communicated, it is necessary to review and seize a variety of e-
23 mail communications, chat logs and documents, that identify any users of the subject account
24 and communications occurring in temporal proximity to incriminating messages or chats that
25 provide context to the incriminating communications.

CONCLUSION

51. Based on the forgoing, I request that the Court issue the proposed search warrant. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “in or for a district in which the provider of a wire or electronic communication service is located or in which the wire or electronic communications, records, or other information are stored.” 18 U.S.C. § 2711(3)(A)(ii). Pursuant to 18 U.S.C. § 2703(g), the government will execute this warrant by serving the warrant on Microsoft. Because the warrant will be served on Microsoft who will then compile the requested records and data, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night. Accordingly, by this Affidavit and Warrant, I seek authority for the government to search all of the items specified in Section I, Attachment B (attached hereto and incorporated by reference herein) to the Warrant, and specifically to seize all of the data, documents and records that are identified in Section II to that same Attachment.



 Amy Garon, Special Agent
 Department of Homeland Security
 Homeland Security Investigations

The above-named agent provided a sworn statement to the truth of the foregoing affidavit by telephone on this 30th day of November 2022



 United States Magistrate Judge